

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
CURTIS WILLIAMS, JR.)
Debtor(s).) CASE NO. 15-31771-DHW-13
)

OBJECTION TO CONFIRMATION

Now comes GUARDIAN CREDIT UNION, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. The debtor has failed to provide evidence of insurance coverage as required 11 U.S.C. Section 1326(a)(4) on the collateral securing the loans of the movant, to wit: 2008 CHEVROLET IMPALA.

2. This creditor has filed Court Claim #7 in the amount of \$6,889.96 and Court Claim #8 in the amount of \$1,291.34 both of which are secured by the 2008 Chevrolet Impala.

3. The collateral securing the debts of the creditor is grossly undervalued and/or the specified monthly payment is insufficient to provide this creditor with adequate protection against depreciation of its interest over the term of the plan. The plan proposes to value the collateral at \$7,000.00 whereas the NADA retail value is \$8,725.00.

4. The plan fails to provide for the secured claim of this creditor as required by 11 U.S.C. Section 1325(a)(5). The plan fails to make a secured provision for Court Claim #8 although there is more than enough equity in the collateral to fully secure said claim.

WHEREFORE, GUARDIAN CREDIT UNION, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

GUARDIAN CREDIT UNION

By: /s/ Leonard N. Math

Of Counsel:

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this August 26, 2015.

Curtis C. Reding

Chapter 13 Trustee

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/s/ Leonard N. Math